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March 30, 2021

Via CM/ECF

Honorable Edward S. Kiel, U.S.M.J.
United States District Court
District of New Jersey
Frank R. Lautenberg U.S. Post
Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

Re: Scalia v. 300 Broadway Healthcare, L.L.C., et al 2:20-00622-CCC-ESK

Dear Judge Kiel:

This firm represents Defendant Steve Kleiman and Defendant New Vista in the above referenced matter. Please accept this request for a two-week extension of the 60-day deadline to file the papers necessary to dismiss this action under F.R.C.P. 41.

The parties are extremely close on agreeing to the terms of the Consent Agreement, however due to the holidays counsel has to reconvene with their clients prior adopting the final agreement.

With the Courts permission it is respectfully requested that the parties be permitted to file their Consent Agreement by no later than April 21, 2021.

We thank Your Honor for your time and consideration.

Respectfully submitted,

JASINSKI, P.C.

s/ Robert P. Manetta

ROBERT P. MANETTA